

REMARKS

In an Office Action dated August 26, 2010 (“*Office Action*”), the Examiner rejected claims 33-60 under 35 U.S.C. § 103(a) as being unpatentable over what the Examiner characterized as Applicant’s Admitted Prior Art (“AAPA”) in view of U.S. Patent Application Publication No. 2003/0018491 to Nakahara et al. (“*Nakahara*”).

By this Amendment, Applicant has amended claims 33, 37, 42, 47, 51, 56, and 60, and the specification. The amendments to the claims add no new matter and are fully supported by the specification. The amendments to the specification are made to correct typographical errors and substitute the descriptions of incorporated applications with patent publication numbers.

Claims 33-60 remain pending. The Applicant respectfully traverses the aforementioned rejections and requests reconsideration based on the following remarks. In addition, the Applicant does not necessarily agree with or acquiesce in the Examiner’s characterization of the claims or the cited references, even if those characterizations are not addressed herein.

Claim Rejections Under 35 U.S.C. § 103(a)

Claims 33-60 stand rejected under 35 U.S.C § 103(a) as being unpatentable over AAPA in view of *Nakahara*. *Office Action*, pp. 3-10. Applicant submits that a *prima facie* case of obviousness has not been established under 35 U.S.C § 103(a) to reject claims 33-60, as amended. In particular, Applicant respectfully submits that the cited references, whether viewed separately or in any combination, fail to disclose or suggest, all elements recited in claims 33-60.

Claim 33, as amended, recites a method of generating an Authorized Domain, comprising, *inter alia*:

“binding at least one device to at least one user, **such that the at least one device is indirectly linked to the domain identifier through the at least one user**, by obtaining or generating a Device Owner List comprising a unique identifier for a user and a unique identifier for each device belonging to the user, thereby defining that the at least one device is bound to the user, or in that the binding of at least one device to at least one user comprises obtaining or generating a Device Owner List for each device to be bound, the Device Owner List comprising a unique identifier for a user and a unique identifier for a device belonging to the user, thereby defining that the device is bound to the user, thereby obtaining a number of devices and a number of users that is authorized to access a content item of said Authorized Domain.” *Emphasis added.*

Applicant respectfully submits that *AAPA* and *Nakahara*, alone or in combination, fail to disclose or suggest at least this claim element.

Amended claim 33 recites “**binding** at least one **device to at least one user, such that** the at least one **device is indirectly linked to the domain identifier through** the at least one **user...**” (emphasis added). Claim 33 differs from the *AAPA* in at least the following respect: In the *AAPA*, devices are **directly** linked to the domain ID and the devices are **indirectly** linked to the users. See Figure 1. Thus, *AAPA* fails to teach or suggest “binding at least one device to at least one user, such that the at least one device is indirectly linked to the domain identifier through the at least one user,” as recited in amended claim 33.

Nakahara fails to cure at least the aforementioned deficiencies of *AAPA*. *Nakahara* apparently relates to a content usage device and a network system, and a license information acquisition method for effectively using license information distributed from a server. See paragraph [0001]. Nowhere does *Nakahara* disclose “binding at least one device to at least one user, such that the at least one device is indirectly linked to the

domain identifier through the at least one user," as recited in amended claim 33. Thus, *Nakahara* fails to cure the deficiencies of *AAPA* and does not anticipate claim 33.

For at least the above reasons, claim 33 is allowable over *AAPA* and *Nakahara*, alone or in combination. Independent claims 47 and 60, although different in scope, recites elements similar to that recited in independent claim 33, and are therefore allowable for at least the same reasons as claim 33. Claims 34-46 and 48-59 are allowable for at least the same reasons as the claim from which they depend. Accordingly, Applicant respectfully requests that the Examiner withdraw the rejection of claims 33-60 under 35 U.S.C. § 103.

Conclusion

In view of the foregoing remarks, Applicant submits that this claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicant therefore requests reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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